

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

|                                  |   |                             |
|----------------------------------|---|-----------------------------|
| In the Matter of                 | ) |                             |
|                                  | ) |                             |
| Modification of Part 74 of the   | ) |                             |
| Commission's Rules to Permit     | ) | Docket No.: <b>RM-11338</b> |
| AM Broadcast Stations to operate | ) |                             |
| FM Translator stations           | ) |                             |

**COMMENTS OF JOHN PAVLICA, JR.**

As an American consumer, as an electrical engineer, and as a licensed Amateur Radio operator, I respectfully submit my comments regarding use of translator transmitters on the FM band for existing AM band radio stations. I am whole-hearted in favor of allowing AM stations licenses for FM translator stations – but only with the conditions set below.

I. Conditions Set Upon the AM Broadcasters

I suggest the following conditions be met for any AM station desiring an FM translator license:

1. FM translator **MUST** be a complete OFF-AIR simulcast of the AM broadcast station, with the exception of night-time broadcasts of an AM daytime station and an emergency where the AM station is off-air due to loss of power or natural disaster;

then translator broadcasting can originate at the AM studio or, worst case, at the FM translator site.

2. AM station MUST maintain analog AM transmissions for the nearly one billion legacy AM band receivers in the United States. No exceptions.

3. FM translator audio is an OFF-AIR audio feed from the AM station. This tuner used to receive the off-air AM signal must meet or exceed the AMAX or AMAX Stereo standards for reception (minimum of 7.5 KHz audio bandwidth, AM impulse noise blanking/reduction). If the FM translator station desires to have FM stereo audio, then stereo audio must be broadcast by the analog AM station using the C-Quam AM stereo system, Kahn ISB stereo system, or Kahn CAM-D stereo system, and received and demodulated by the stereo AM tuner. This will encourage quality improvements at both AM transmitters as well as receiver manufacturers building better analog AM receiver sections. I also suggest the FCC look into 'mandatory AM receiver quality standards for radios with FM', as was suggested by Mr. Scott Todd in a previous request to the FCC.

4. FM translator station shall be located within 1mv signal area of the AM station, with exceptions granted for AM stations with severely directional signals, provided the FM transmitter is located in the same Arbitron "market" area.

5. FM translator shall be 250 watts of power and have licensing priority over any incumbent FM translator, in particular, over 'satcasters' that have no local studios serving the public in their area.

6. FM translator must relay ALL EAS alert codes, in particular, former Daytimer stations must verify that they now have a reliable EAS feed at night while their AM transmitter is off-air.

## II. AM Station FM Licensing Order

I suggest the following order be followed when the AM stations apply for FM translator licenses:

1. ALL AM daytime-only stations are to be given first choice of translators in a given market. Licensed Daytime-only AM stations would be the only licensees without any exceptions as listed in Section III of this document.
2. All "stand-alone" AM stations, with the exceptions listed in Section III.
3. All Class C (the old Class IV) "graveyard channel" 1KW stations.
4. Class B stations of 10KW or less, only if they are directional stations or stations with severely reduced nighttime power or antenna nulls in their market area.

## III. AM Stations to be Excluded from FM Translator Licenses (Daytimers exempt)

1. Clear channel frequency (Class A) stations or any stations operating 50KW nights.

2. 'Expanded Band' stations (unless they are a stand-alone AM operation AND they have relinquished their former AM frequency license)
3. AM stations with an FM sister-station in the same market broadcasting in iBiquity HD (FM-IBOC), as they should be using their IBOC HD simulcast technology for their AM operation, rather than obtain a translator license, unless they are a licensed daytime-only station.

Analog AM radio broadcasting is a great service to the general public, and remains a faithful servant during times of emergencies and disasters. The recent hurricane season proved just how valuable a clear channel class AM station is to people in need. An old AM transistor radio provides many hours of use on a single battery, unlike the digital receivers of today that are still very power hungry (HD-IBOC and satellite radio). AM stations have a great gift (that is to some AM stations a curse) – and that is the fantastic long-range reception available to the public at night by analog AM radio. During disasters very large areas are afforded coverage by a single AM station, and they need to continue to service the public without interference from IBOC adjacent channel digital hash, noisy traffic signals not meeting FCC Part 15 requirements, or possibly even BPL. I would even encourage the Commission to consider permitting existing 50KW clear channel class A analog AM stations a power increase to 750KW to better serve large regions.

I hope that the commission will take all of my suggestions listed above into consideration and issue a quick order so that these AM stations can begin a quick build-up of FM translators to improve their service to the local public they have served so well for so long, and may continue to do so on both the AM and FM bands.

Thank you for allowing me to voice my opinions and suggestions.

Respectfully submitted,

John Pavlica, Jr.